

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of
THE COMMONWEALTH OF PUERTO RICO,
et al.

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**CONSUL-TECH CARIBE INC.'S MOTION FOR LEAVE TO CITE SPANISH
LANGUAGE DOCUMENTS AND FOR EXTENSION OF TIME TO FILE CERTIFIED
TRANSLATIONS**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE

HON. LAURA TAYLOR SWAIN:

COMES NOW, Cosul-Tech Caribe, Inc. ("Consul-Tech"), represented by the undersigned attorneys, and very respectfully hereby submits this motion requesting the entry of an order, substantially in the form of Exhibit A hereto (the "Proposed Order"), granting Consul-Tech leave to cite Spanish-language documents in connection with the 'Reply' (as defined below) being filed

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

today and an extension of time to file certified English-language translations, and in support thereof.

1. Today, Consul-Tech filed a “Reply to the Objection to Motion for Allowance and Payment of Administrative Expense Claim” [D.E. 14168] (the “Reply”).

2. In support of the arguments raised in the Reply, Consul-Tech cited various documents in Spanish: (1) Act 57-2020, known as the “Complementary Law to Address the Effects of the COVID-19 Emergency on the Puerto Rican Economy”; (2) Regulation 4415 of the Department of Housing; (3) Regulation 7040 of the Department of Education; and, (4) Puerto Rico Court of Appeals decision on *Octagon Consultant Group v. Municipio de Toa Baja*, 2019 WL 4417472 (TCA 2019);

3. Due to time constraints, despite diligent efforts, Consul-Tech was unable to obtain certified English-language translations of the Spanish-Language documents prior to today’s filing.

4. Accordingly, Consul-Tech seeks leave from this Court to rely on the Spanish-Language documents in their original Spanish language and requests an extension of ten (10) days, to and including September 14, 2020, to file a certified English-language translations of the referenced documents pursuant to Local District Court Rule 5(g).

WHEREFORE, Consul-Tech respectfully requests the Court enter the Proposed Order, attached hereto as Exhibit A, permitting it to file the Spanish-Language documents in their original Spanish language, granting it until September 14, 2020 to submit a certified English-language translation of the same, and granting such other and further relief as is just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 2nd day of September 2020.

Dated: September 2, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on September 2, 2020, I filed the instant motion through the Court's CM/ECF system, which will send notification of such filing to all CM/ECF participants, in compliance with the case management order in the case.

/s/Alana Vizcarrondo-Santana